

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
)
IP-Enabled Services) WC Docket No. 05-196
E911 Requirements for IP-Enabled Service Providers)

**Subscriber Notification Report
of the Citizens and Frontier Telecommunications Carriers**

Pursuant to the Enforcement Bureau's July 26, 2005 Public Notice in this proceeding, the Citizens and Frontier telecommunications carriers¹ ("**Frontier**") hereby file this Subscriber Notification Report.

1. A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U.S. mail).

Response: Frontier notified one subscriber orally of the limitations of its VoIP service on September 18, 2003 and hand delivered a letter in the attached format to that subscriber on August 9, 2005, together with warning stickers in the attached format. Frontier either hand delivered or mailed via U.S. Mail substantially identical letters and stickers to all other subscribers on or before July 29, 2005.

2. A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005.

Response: Frontier has received affirmative written acknowledgement from 20% of its subscribers, and Frontier expects to obtain affirmative written acknowledgements from all other subscribers prior to August 29, 2005.

3. A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service.

¹ The Citizens and Frontier telecommunications carriers are incumbent local exchange, competitive local exchange and interexchange carriers under the common ownership of Citizens Communications Company.

Response: See response to question 1 above and the attached form of letter and stickers.

4. A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above.

Response: None.

5. A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005.

Response: Frontier personnel will individually contact each of the remaining subscribers to obtain affirmative written acknowledgements and discuss any questions the subscribers may have. Frontier will disconnect any subscribers who refuse to provide an affirmative written acknowledgement by August 29, 2005, but Frontier believes that such an eventuality is extremely unlikely.

6. A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers.

Response: Frontier's Federal Regulatory group is currently maintaining the acknowledgements.

7. The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the *VoIP E911 Order*.

Response: The person responsible for compliance is Robert Binder, Manager - Governmental and External Affairs, Frontier Communications, 180 South Clinton Ave., Rochester, NY 14646, telephone number (585) 777-6401, e-mail rbinder@czn.com

Respectfully submitted,



Gregg C. Sayre
Associate General Counsel – Eastern Region
Citizens and Frontier Telecommunications
180 South Clinton Avenue
Rochester, New York 14646-0700

DATE: August 10, 2005

Attachments



Date: _____

Name: _____

Address: _____

Re: VoIP 911 Service Limitations

Dear _____:

Frontier Communications is providing this letter to advise _____ of certain emergency 911 service limitations associated with the interconnected Voice over Internet Protocol (VoIP) service. Frontier Communications is currently providing to _____.

On June 3, 2005 the Federal Communications Commission released an order requiring all telecommunications carriers to provide their customers subscribing to VoIP service interconnected to the public switched telephone network with an advisory explaining the circumstances under which emergency 911 service may not be available through the VoIP service or may be in some way limited by comparison to the emergency 911 service available through traditional wireline phone service. VoIP providers must provide subscribers with warning stickers to advise potential users of the emergency 911 limitations of the VoIP service. The FCC also required telecommunications carriers to obtain and keep a record of affirmative acknowledgement by every customer of having received and understood this advisory.

Please be advised that the Voice over Internet Protocol (VoIP) service provided by Frontier Communications to _____ is subject to several limitations associated with emergency 911 services, including, but not limited to, the following:

1. **Relocation of Equipment.** Relocation of the IP-compatible customer premise equipment (CPE) to another physical location or to another broadband connection may result in inaccurate emergency 911 location information being transmitted to the responsible public safety authority (police/fire/etc.) or may result in an emergency 911 call being routed to the incorrect public safety authority. Public safety authority systems may incorrectly identify a user located outside of your immediate _____ location on _____. This would be true of remote service locations, or user residences. If _____ would like to relocate the VoIP CPE, please contact Frontier.
2. **Broadband Connection Limitations.** VoIP services utilize an underlying high-speed broadband connection to receive and transmit calls. If the underlying broadband connection or service fails or is interrupted _____ will be unable to make

emergency 911 calls using the VoIP service or receive incoming VoIP calls.

3. Electrical Power Limitations. VoIP services and CPE require electric power to operate. In contrast, traditional wireline telephone service generally operates notwithstanding the loss of electrical power. If electrical power fails or is interrupted [redacted] will be unable to make emergency 911 calls using the VoIP service or receive incoming VoIP calls.

These are just some of the limitations that may impact [redacted]'s ability to complete emergency 911 calls using the VoIP service. Please make every effort to ensure that all employees, guests and other potential users of the VoIP service at [redacted] are advised of these limitations. To help with this educational effort, please feel free to distribute this letter to all potential users of the VoIP service at [redacted]. In addition, enclosed with this letter are warning stickers [redacted] should affix on or near the VoIP CPE used to initiate and receive VoIP service calls.

Also, as noted above, Frontier is required to obtain and retain each VoIP service customer's written acknowledge that they have received notification regarding the potential limitations associated with emergency 911 service and VoIP service. I would appreciate it if [redacted] would sign one copy of this letter and return it to me at the address below.

If you have other questions or concerns regarding the VoIP service emergency 911 capabilities or this letter, please do not hesitate to contact me.

Account Manager

[redacted] has received an explanation of and understands the emergency 911 limitations associated with the VoIP service provided by Frontier Communications. [redacted] has also received emergency 911 limitation warning stickers from Frontier and will take action to affix these stickers on or near the CPE used to make and receive VoIP calls.

